

EXHIBIT “A”

Affidavit of Ryan S. Watson

1. I, Ryan S. Watson, am a lifelong resident of Delaware County, Pennsylvania. I attended Virginia Polytechnic and State University in Blacksburg, Virginia. I graduated with a Bachelors of Science in Business Management concentrating in Entrepreneur Studies. After graduating in 2010, I attended Widener University's School of Law in Wilmington, Delaware. After graduation I successfully passed and was admitted to the Bars of the Commonwealth of Pennsylvania and the State of New Jersey.
2. On or about May 23, 2014 I completed the BATFE's Application to Make and Register a Firearm, more commonly known as a Form 1. I filled this form out as a Trustee of the Watson Family Gun Trust. The application was to convert a semi-automatic Spikes Tactical AR-15 Lower Receiver into an automatic receiver. I submitted the form with the required \$200.00 tax via certified mail.
3. On June 24, 2014, the BATFE's electronic E-Forms system went back online. I submitted another Form 1, electronically, to convert a Palmetto State Armory AR-15 lower receiver into an automatic receiver. I paid the \$200.00 stamp tax via BATFE's online system and I submitted the Form 1 as a Trustee of the Watson Family Gun Trust.
4. On the morning of August 5, 2014, I received an email from the BATFE's National Firearms Branch stating that my Form 1 submitted on June 24, 2014 was approved and I was issued a Tax Stamp.
5. After seeking the opinion of Firearms Dealers who regularly deal with Title II/NFA Firearms, I decided to call the BATFE's NFA Branch in West Virginia. On or about August 8, 2014 I called the NFA Branch and spoke with an unidentified male. I asked the individual if the BATFE was now approving Trusts to manufacture machine guns from existing firearms via Form 1. I was told that it depended on some "legalities." I further inquired as to what the NFA employee meant by "legalities." His response was that if machine guns were allowed to be owned within one's states was the major legality.
6. On or about September 4, 2014, in accordance with the BATFE's approval, a machine gun was manufactured from the approved Palmetto State Armory lower receiver.
7. On the evening of September 10, 2014 I received an email from the NFA Branch stating that my application for the approved Palmetto State Lower was changed to disapproved.
8. On or about September 22, 2014, I received the Form 1 submitted on May 23, 2014 from the NFA Branch. The Form 1 was contained whiteout on the "Approved" box, the signature line, and on the date line. In addition to the whiteout the form was marked "DISAPPROVED" twice with red ink. The form had clearly been approved then revoked.

